

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UMG RECORDINGS, INC., *et al.*,

Plaintiffs,

vs.

GRANDE COMMUNICATIONS
NETWORKS LLC,

Defendant.

§
§
§
§
§
§
§
§
§
§

Civil Action No. 1:17-cv-00365-DAE-AWA

EXHIBIT 4

PLAINTIFFS' EXHIBIT LIST

Pursuant to Local Rule 16(e)-4 and this Court's Order Resetting Jury Trial and Related Deadlines (Dkt. 366), Plaintiffs submit their Exhibit List. Plaintiffs identify the exhibits they expect to offer, and exhibits they may offer if the need arises, separately. The Exhibit List does not include exhibits that Plaintiffs may introduce solely for impeachment purposes. Plaintiffs reserve the right to amend or supplement this list, including to identify additional exhibits in response to Defendant's pretrial disclosures.

Dated: December 28, 2021

Respectfully submitted,

By: /s/ Andrew H. Bart
Andrew H. Bart (admitted *pro hac vice*)
Jacob L. Tracer (admitted *pro hac vice*)
Jenner & Block
1155 Avenue of the Americas
New York, NY 10036
Telephone: (212) 891-1600
Facsimile: (212) 891-1699
abart@jenner.com
jtracer@jenner.com

Robert B. Gilmore (admitted *pro hac vice*)
Philip J. O’Beirne (admitted *pro hac vice*)
Michael A. Petrino (admitted *pro hac vice*)
Kevin J. Attridge (admitted *pro hac vice*)

Stein Mitchell Beato & Missner LLP

901 15th Street, N.W., Suite 700

Washington, DC 20005

Telephone: (202) 737-7777

Facsimile: (202) 296-8312

rgilmore@steinmitchell.com

pobeirne@steinmitchell.com

mpetrino@steinmitchell.com

kattridge@steinmitchell.com

Daniel C. Bitting (State Bar No. 02362480)

Paige A. Amstutz (State Bar No. 00796136)

Scott Douglass & McConnico LLP

303 Colorado Street, Suite 2400

Austin, TX 78701

Telephone: (512) 495-6300

Facsimile: (512) 495-6399

dbitting@scottdoug.com

pamstutz@scottdoug.com

Attorneys for Plaintiffs

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
1	RC-D_00000001	RC-D_01350635		Hard drive containing Rightscorp infringement notice files (RC-D001)	X				
2				Summary Spreadsheet: Rightscorp infringement notice files (RC-D001)	X				
3	RC-D_01350636	RC-D_01410446		Hard drive containing Rightscorp downloaded audio files (.mp3)	X				
4				Summary Spreadsheet: Rightscorp downloaded audio files (.mp3)	X				
5				Rightscorp data re downloaded audio files (produced 2/27/19)	X				
6				Thumb drive containing Grande notice files (.txt) in fullnoticeoutput.zip file (received on 7/9/18 from Defendant)	X				
7				Summary Spreadsheet: Grande notice files (.txt)	X				
8	GRANDE2551078	GRANDE2551532		List of Forwarded Emails to ISPs	X				
9	GRANDE2551790	GRANDE2551790		Grande CSV file listing infringement notices	X				
10	GRANDE2542672	GRANDE2551077		List of CSG/OSG Letters for 245,429 infringement letters sent to Grande Customers between 12/30/13 and	X				
11	RIGHTSCORP 00003842	RIGHTSCORP 00004868	2/26/13 - 8/9/16	Compilation of Repeat Infringer Notifications and corresponding attachments	X				
12				Summary Spreadsheet: Repeat Infringer Notifications and corresponding attachments	X				
13	RIAA_00000003	RIAA_00041198		Audible Magic match output files	X				
14				Summary Spreadsheet: Audible Magic match output files	X				
15				List of works in suit with corresponding counts of audio files matched by Audible Magic	X				
16				List of works in suit and with corresponding audio files matched by Audible Magic	X				
17				Hard drive containing Rightscorp Source Code File (Java Source Code, produced 8/8/18)	X				
18				Hard drive containing Rightscorp Source Code Records (Production RC-	X				
19				Decl. of Alasdair McMullan, Ex. A-1: List of Universal plaintiffs' works in suit		X			
20	UMG_00000001; UMG_00019638; UMG_00019681; UMG_00019696; UMG_00021517; UMG_00021531	UMG_00000801; UMG_00019639; UMG_00019682; UMG_00019698; UMG_00021526; UMG_00021534		Compilation of copyright registration documentation for Universal plaintiffs' works in suit	X				
21				Decl. of Wade Leak, Ex. B-1: List of Sony plaintiffs' works in suit		X			
22	SME_00000001; SME_00006016	SME_00000387; SME_00006019		Compilation of copyright registration documentation for Sony plaintiffs' works in suit	X				
23				Decl. of Steven Poltorak, Ex. C-1: List of Warner Bros. plaintiffs' works in suit		X			
24	WBR_00000001; WBR_00003976; WBR_00004031; WBR_00004035; WBR_00004052; WBR_00004171; WBR_00004364	WBR_00000218; WBR_00003977; WBR_00004032; WBR_00004038; WBR_00004073; WBR_00004198; WBR_00004419		Compilation of copyright registration documentation for Warner Bros. plaintiffs' works in suit	X				
25				Copyright registration certificates for One Direction's "Up All Night" (SR703-645) and "Take Me Home" (SR714-020)	X				
26				Medley audio recording of Universal plaintiffs' works	X				
27				Medley audio recording of Sony plaintiffs' works	X				
28				Medley audio recording of Warner Bros. plaintiffs' works	X				

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
 UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
30			4/9/18	Defendant Grande Communications Networks LLC's Answer and Affirmative Defenses to the Original		X			
31			7/20/17	Defendant Grande Communications Networks LLC's Objections and Responses to Plaintiffs First Set of Interrogatories		X			
32			7/20/17	Patriot's Objections and Responses to Plaintiffs First Set of Interrogatories		X			
33			8/18/17	Defendant Grande Communications Networks LLC's Amended Objections and Responses to Plaintiffs First Set of Interrogatories		X			
34			8/18/17	Patriot's Amended Objections and Responses to Plaintiffs First Set of Interrogatories		X			
35			3/19/18	Defendant Grande Communications Networks LLC's Objections and Responses to Plaintiffs First Set of Requests for Admission		X			
36			3/19/18	Patriot Objections and Responses to Plaintiffs First Set of Requests for Admission		X			
37			6/6/18	Defendant Grande Communications Networks LLC's Objections and Responses to Plaintiffs Second Set of Requests for Admission		X			
38			6/6/18	Defendant Grande Communications Networks LLC's Objections and Responses to Plaintiffs Third Set of Interrogatories		X			
39			7/6/18	Defendant Grande Communications Networks LLC's Third Amended Objections and Responses to Plaintiffs First Set of Interrogatories (Version 2)		X			
52				Printout: "DMCA Designated Agent Directory" (appears as PX52 in: Horton, 022118)		X			
53	GRANDE0002050	GRANDE0002056		DMCA Policy and Procedure (appears as PX53 in: S. Christianson, 062718; L. Christianson, 062618; Horton, 022118; Horton, 092518; Murphy, 092718 Roeder, 111618; Rohre, 022218)	X				
54			11/24/17	Defendant Grande Communications Networks LLC's Third Amended Objections and Responses to Plaintiffs' First Set of Interrogatories (Version 1) (appears as PX54 in: S. Christianson, 062718; S. Christianson, 062818; L. Christianson, 062618; Horton, 022118)		X			
55	GRANDE0816590	GRANDE0816591	4/14/17	Email re Copyright Infringement - Add on to current process (appears as PX55 in: S. Christianson, 062718; S. Christianson, 062818; Horton, 022118)	X				
56	GRANDE0813928	GRANDE0813932	4/14/17	Email re Review Abuse Process - Following Up - Docs Attached for Review (w/ attachs.) (appears as PX56 in: L. Christianson, 062618; Creel, 061918; Horton, 022118)	X				
57	GRANDE0000155	GRANDE0000155	4/13/17	Spreadsheet titled "DMCA Excessive ViolationsV2 from 1/1/2017 - 1/31/2017" (appears as PX57 in:	X				
58	GRANDE0000195	GRANDE0000195	4/13/17	Spreadsheet titled "DMCA Excessive ViolationsV2 from 10/1/2016 - 12/31/2016" (appears as PX58 in: Horton, 022118)	X				
59	GRANDE0000194	GRANDE0000194	4/13/17	Spreadsheet titled "DMCA Excessive ViolationsV2 from 1/1/2017 - 3/31/2017" (appears as PX59 in:	X				

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
60	GRANDE1438198	GRANDE1438199		Spreadsheet listing "Mail Notes" by account number (appears as PX60 in: S. Christianson, 062718; Roeder 111618; Rohre, 022218; Horton, 022118)		X			
61	GRANDE0000199	GRANDE0000199		Spreadsheet listing internal Grande ticket numbers (appears as PX61 in: S. Christianson, 062718; Horton, 022118)		X			
62	GRANDE0000200	GRANDE0000200		Spreadsheet listing internal Grande ticket numbers (appears as PX62 in: S. Christianson, 062718; Horton, 022118)		X			
63	GRANDE1094438	GRANDE1094438	10/25/10	Email re Systems Report, 10/25/2010 (appears as PX63 in: Horton, 022118)	X				
64	GRANDE0685248	GRANDE0685248	2/14/17	Email re CPNI and DMCA Letters Processed by CSG (appears as PX64 in: Horton, 022118)	X				
65	GRANDE0000144	GRANDE0000144	12/2/10	Email chain re DMCA Letters/Script (appears as PX65 in: Horton, 022118)	X				
66	GRANDE0002727	GRANDE0002727	7/7/13	Email re Email Activity Report - archive.atlanticbb.com [172.28.10.7] (appears as PX66 in: Horton, 022118)	X				
67	GRANDE0181612	GRANDE0181612	5/5/14	Email re Systems Report, 05/05/2014 (appears as PX67 in: L. Christianson, 062618; Horton, 022118)	X				
68	GRANDE0000115	GRANDE0000124	4/1/14	Email chain re [abuse@grandecom.com #699083] Notice of Copyright Infringement, Case #: P62850109 (appears as PX68 in: Horton, 022118; Murphy, 092718; Bloch, 062018)	X				
69	GRANDE2152629	GRANDE2152636	10/14/13	Email re [abuse@grandecom.com #644240] Copyright Infringement - Notice ID #22281070826 (appears as PX69 in: S. Christianson, 062718; Fogle, 062818; Horton, 022118; Murphy, 092718)	X				
70	GRANDE0797517	GRANDE0797517	1/5/16	Email re Systems Report, 01/05/2016 (appears as PX70 in: Horton, 022118)	X				
71	RC-D_00004652	RC-D_00004652		Email infringement notice TC-c4658fcl-5ec8-4d95-al5ed4f6c5a0fb26 (appears as PX71 in: Horton, 022118)	X				
72	RC-D_00020113	RC-D_00020113		Email infringement notice TC-04fb6337-ffa2-456c-82a7-ffa9d8df12fb (appears as PX72 in: Horton, 022118; Horton, 092419)	X				
73	RC-D_01210736	RC-D_01210736		Email infringement notice TCac0af4ff-148a-44ec-94de-485d05dll34b (appears as PX73 in: S. Christianson, 062718; Cohen, 110918; Horton, 022118)	X				
77	GRANDE1718860	GRANDE1718860	5/19/16	Email chain re DMCA - Abuse notifications (appears as PX77 in: Horton, 022118)		X			
78	GRANDE1718865	GRANDE1718865	5/19/16	Email chain re DMCA - Abuse notifications (appears as PX78 in: Horton, 022118)		X			
79	GRANDE0479962	GRANDE0479963	11/16/11	Email re Network Analysis/IP Engineering -Agenda 11.17.11 (appears as PX79 in: Horton, 022118)		X			
80	GRANDE1435499	GRANDE1435499	2/18/16	Email re Rightscorp - DMCA (appears as PX80 in: Horton, 022118)	X				
81	GRANDE1435526	GRANDE1435527	2/18/16	Email chain re Rightscorp - DMCA (appears as PX81 in: Horton, 022118; Horton, 092518)	X				
82	GRANDE1435539	GRANDE1435540	2/18/16	Email chain re Rightscorp - DMCA (appears as PX82 in: Horton, 022118; L. Christianson, 062618)	X				
83	GRANDE1435587	GRANDE1435587	2/18/16	Email re RightsCorp - Customers Network Infringement Ltr (appears as PX83 in: Horton, 022118; Rohre, 022218)	X				
84	GRANDE1438198	GRANDE1438199	2/22/16	Email re Rightscorp (w/ attach.) (appears as PX84 in: Horton, 022118)	X				
86	GRANDE0707251	GRANDE0707251	11/9/16	Email re Follow up: DMCA (appears as PX86 in: Fogle, 062818; Horton,	X				

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
88	GRANDE0728095	GRANDE0728095	3/31/17	Email chain re Notice of infringement (USA) (appears as PX88 in: Creel, 061918; Horton, 022118)	X				
90	GRANDE0000001	GRANDE0000001	4/11/13	Email re DMCA notices (appears as PX90 in: Horton, 022118; Fogle, 062818; Rohre, 022218)	X				
91	GRANDE0000009	GRANDE0000010	4/11/13	Email chain re DMCA notices (appears as PX91 in: Creel, 061918; L. Christianson, 062618; Fogle, 062818; Horton, 022118; Murphy, 092718;	X				
92	GRANDE0000243	GRANDE0000243	7/5/17	Spreadsheet titled "Specific Account DMCA Violations" (appears as PX92 in: Cohen, 110918; Bloch, 062018; L. Christianson, 062618; S. Christianson, 062718; Horton, 022118)	X				
95	GRANDE0573985	GRANDE0573986	1/27/17	Email re Consolidated Grande Budget - 2017 v2 0 2.xlsx (w/ attach.) (appears as PX95 in: Rohre, 022218)		X			
96	GRANDE0016786	GRANDE0016788	8/28/15	Email re V8 forecast (w/ attach.) (appears as PX96 in: Rohre, 022218)		X			
97	GRANDE0691472	GRANDE0691473	9/14/16 - 9/15/16	Email re Consolidated Grande Budget - 2017.xlsx (w/ attach.) (appears as PX97 in: Rohre, 022218)		X			
98	GRANDE0760489	GRANDE0760491	9/30/16	Email chain re P&L Call (w/ attach.) (appears as PX98 in: Rohre, 022218)		X			
99	GRANDE0946364	GRANDE0946364	8/7/17	Email chain re I'm on a call. (appears as PX99 in: Rohre, 022218)		X			
101			1/2/18	Defendant Grande Communications Networks LLC's Supplemental Responses to Interrogatories 11 and 15 of Plaintiffs' First Set of Interrogatories (appears as PX101 in: Rohre, 022218)		X			
102			2/21/18	Verification for Document Produced in Response to Interrogatories (appears as PX102 in: Rohre, 022218)	X				
103			10/1/13	Grande Internet Acceptable Use Policy (appears as PX103 in: Cohen, 110918; L. Christianson, 062618; S. Christianson, 062718; Rohre, 022218; Horton, 092518; Murphy, 092718)	X				
106	GRANDE1438543	GRANDE1438548	2/22/16	Email chain re Rightscorp (w/ attachs.) (appears as PX106 in: Rohre, 022218)	X				
107	GRANDE1438324	GRANDE1438326	2/18/16- 2/22/16	Email chain re Rightscorp - DMCA (appears as PX107 in: Cohen, 110918; L. Christianson, 062618; Fogle, 062818; Roeder, 111618; Rohre, 022218; Shockley, 092618; Horton, 092518)	X				
109	GRANDE1435590	GRANDE1435591	2/18/16	Email re Accepted: Grande RightsCorp Ltr -- Network Infringement (w/ attach.) (appears as PX109 in: Rohre, 022218)	X				
110	GRANDE1438146	GRANDE1438147	2/18/16- 2/22/16	Email re RightsCorp -- Customers Network Infringement Ltr (appears as PX110 in: Rohre, 022218)	X				
112	GRANDE0152576	GRANDE0152576	01/24/14- 02/13/14	Email chain re Baylor Stadium Public Wifi Technology discussion (appears as PX112 in: Rohre, 022218)	X				
113	GRANDE0301966	GRANDE0301967	4/10/14	Email chain re Grande (appears as PX113 in: Rohre, 022218)	X				
114	GRANDE0549431	GRANDE0549431	12/22/15	Email re Patent Infringement liability (appears as PX114 in: Rohre, 022218)		X			
115	GRANDE0000231	GRANDE0000234		End User License Agreement (appears as PX115 in: Rohre, 022218)	X				
116	GRANDE0019395	GRANDE0019396	4/24/13	Email re Transition Schedule (w/ attach.) (appears as PX116 in: Murphy, 092718; Roeder, 111618; Rohre,		X			
118	GRANDE0673185	GRANDE0673186	2/10/17	Email re Monthly Project Report - January (w/ attach.) (appears as PX118 in: Rohre, 022218)		X			
119	GRANDE0949981	GRANDE0949983	8/8/17	Email chain re Radiate Preliminary July Revenues (w/ attach.) (appears as PX119 in: Rohre, 022218)		X			

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
120	GRANDE0950434	GRANDE0950442	8/8/17	Email chain re Radiate Preliminary July Revenues (w/ attachs.) (appears as PX120 in: Rohre, 022218)		X			
122	GRANDE0000064	GRANDE0000073	3/27/14 - 3/29/14	Email chain re [abuse@grandecom.com #699083] Notice of Copyright Infringement, Case #: P62850109	X				
123	GRANDE0000105	GRANDE0000114	3/27/14 - 4/1/14	Email chain re [abuse@grandecom.com #699083] Notice of Copyright Infringement, Case #: P62850109	X				
125	GRANDE0268417	GRANDE0268417	3/31/14	Email chain re bittorrent issue	X				
126	GRANDE0420072	GRANDE0420074	8/11/10 - 8/12/10	Email chain re DMCA	X				
127	GRANDE0420143	GRANDE0420144	8/11/10 - 8/12/10	Email chain re DMCA	X				
135	GRANDE0000095	GRANDE0000104	3/27/14 - 4/1/14	Email chain re [abuse@grandecom.com #699083] Notice of Copyright Infringement, Case #: P62850109	X				
138	GRANDE0000250	GRANDE0000253	3/31/14	Email chain re bittorrent issue (appears as PX138 in: Creel, 061918)	X				
140	GRANDE0268966	GRANDE0268969	3/31/14	Email chain re bittorrent issue (appears as PX140 in: Fogle, 062818; Murphy, 092718)	X				
143	GRANDE0431365	GRANDE0431365	7/12/17	Email chain re RIAA sues Grande, Screen shot and link		X			
144	GRANDE0431371	GRANDE0431373	7/12/17	Email chain re RIAA sues Grande, Screen shot and link		X			
146	GRANDE0477916	GRANDE0477917	7/26/17	Email chain WFO updates (appears as PX146 in: Creel, 061918)		X			
147	GRANDE0493479	GRANDE0493479	12/18/15	Email re DMCA judgement (appears as PX147 in: S. Christianson, 062818)	X				
148	GRANDE0493486	GRANDE0493486	12/18/15	Email chain re DMCA judgement (appears as PX148 in: Roeder, 111620)	X				
150	GRANDE0707016	GRANDE0707016	10/8/10	Email re DMCA Issue		X			
154	GRANDE1073328	GRANDE1073328	10/8/10	Email re DMCA Issue		X			
155	GRANDE1747439	GRANDE1747439	11/29/14	Email chain re DMCA (appears as PX155 in: Creel, 061918)	X				
156	GRANDE1801114	GRANDE1801114	8/19/16	Email chain re DMCA Calls (appears as PX156 in: Creel, 061918; Shockley, 092618)	X				
157	GRANDE1801130	GRANDE1801131	8/19/16	Email chain re Letter Templates (appears as PX157 in: Shockley, 092618)	X				
158	GRANDE1801206	GRANDE1801213	8/19/16 - 8/20/16	Email chain re Letter Templates (w/ attachs.)		X			
166	GRANDE2518787	GRANDE2518787	12/18/15	Email re DMCA judgement	X				
168	GRANDE2525798	GRANDE2525798	10/8/10	Email chain re DMCA letters (appears as PX168 in: Creel, 061918)		X			
169	GRANDE2539474	GRANDE2539478	3/21/16 - 3/22/16	Email chain re [abuse@grandecom.com #1585298] Notice of Claimed Infringement - Case ID 413176005 (appears as PX169 in: S. Christianson 062718; Murphy, 092718)	X				
170	GRANDE2539497	GRANDE2539498	10/14/10	Email chain re DMCA letters		X			
171	GRANDE2540055	GRANDE2540055	10/25/11 - 11/1/11	Email chain re 866-216-7427		X			
178	GRANDE1435553	GRANDE1435555	2/18/16	Email chain re RightsCorp - DMCA (appears as PX178 in: L. Christianson, 062618)	X				
179	GRANDE1438523	GRANDE1438523	2/22/16	Email chain re DigitalRightsCorp fixed (appears as PX179 in: L. Christianson, 062618)		X			
180	GRANDE1438522	GRANDE1438522	2/22/16	Email chain re DigitalRightsCorp fixed (appears as PX180 in: L. Christianson, 062618)	X				
181	GRANDE1438524	GRANDE1438524	2/22/16	Email chain re DigitalRightsCorp fixed (appears as PX181 in: L. Christianson, 062618)	X				
182	GRANDE1438552	GRANDE1438553	2/22/16	Email chain re DigitalRightsCorp fixed (appears as PX182 in: L. Christianson, 062618)	X				
183	GRANDE1438527	GRANDE1438527	2/22/16	Email chain re DigitalRightsCorp fixed	X				
184	GRANDE1438606	GRANDE1438606	2/22/16	Email chain re DigitalRightsCorp fixed	X				

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
185	GRANDE1647910	GRANDE1647910	02/23/16 - 02/24/16	Email chain re CPNI and DMCA Data Sent to CSG (appears as PX185 in: L. Christianson, 062618)	X				
186	RIGHTSCORP 00004611	RIGHTSCORP 00004612	8/17/15	Email re Grande Communications Termination request for Round Hill Music (w/ attach.) (appears as PX186 in: S. Christianson, 062718; L. Christianson, 062618)	X				
192	GRANDE1001305	GRANDE1001305	10/31/12	Email chain re DMCA? (appears as	X				
193	GRANDE0005896	GRANDE0005899	4/11/13	Email chain re Undeliverable: Testing (w/ attach.) (appears as PX193 in: S. Christianson, 062718)		X			
196			2/4/08	Amended Interim Designation of Agent to Receive Notification of Claimed		X			
197			5/13/16	Amended Interim Designation of Agent to Receive Notification of Claimed Infringement (appears as PX197 in: S. Christianson, 062718)		X			
199				Grande Test Auto Response to emails received at dmca@grandecom.com (appears as PX199 in: S. Christianson, 062718)		X			
200	GRANDE0874831	GRANDE0874832	5/10/17	Email chain re Monthly Project Report - April (w/ attach.) (appears as PX200 in: S. Christianson, 062818)		X			
201			11/25/15	WSJ Article: "Downloaders Beware? Judge Rules Against Cox in Copyright Battle" (appears as PX201 in: S. Christianson, 062818)	X				
202	GRANDE1715200	GRANDE1715201	5/17/16	Email chain re Grande -- DMCA Policy for Website (appears as PX202 in: S. Christianson, 062818)	X				
203	GRANDE0441935	GRANDE0441935	7/14/17	Email re Your Abuse Notification (appears as PX203 in: S. Christianson, 062818)	X				
204				Grande Communications' High Speed Internet Network Management, Service Performance and Terms of Service (appears as PX204 in: Fogle, 062818)	X				
206	GRANDE2439310	GRANDE2439310	8/23/16	Email re DMCA (appears as PX206 in: Fogle, 062818)	X				
207	GRANDE2482342	GRANDE2482342	9/30/16	Email re Reason for email retention enforcement (appears as PX207 in: Fogle, 062818)	X				
211	GRANDE1722374	GRANDE1722374	5/29/16	Email re DMCA (appears as PX211 in: Horton, 092518)	X				
213			5/13/16	Amended Interim Designation of Agent to Receive Notification of Claimed Infringement (appears as PX213 in: Horton, 092518; Murphy, 092718)	X				
214	GRANDE1747433	GRANDE1747433	11/29/14	Email Chain re DMCA (appears as PX214 in: Horton, 092518) (appears as PX214 in: Horton, 092518)	X				
216	GRANDE1435496	GRANDE1435497	2/18/16	Email Chain re Rightscorp -- Customers Network Infringement Ltr [redacted] (appears as PX216 in: Horton, 092518)	X				
218	GRANDE2050897	GRANDE2050897	6/17/16	Email chain re RCN sues BMG/Rightscorp (appears as PX218 in: Horton, 092518)		X			
220	GRANDE1438369	GRANDE1438374	2/22/16	Email chain re Rightscorp (appears as PX220 in: Horton, 092518; Shockley, 092618)		X			
227	GRANDE0881829	GRANDE0881831	8/10/12- 8/14/12	Email chain re Copyright Letter (w/ attach.) (appears as PX227 in: Shockley, 092618)		X			
228	GRANDE1801214	GRANDE1801215	8/19/16- 8/20/16	Email chain re Letter Templates (appears as PX228 in: Shockley,		X			
230	GRANDE0078376	GRANDE0078377	5/8/13	Email re Bank Meeting Script 5.9 (w/ attach.) (appears as PX230 in: Horton, 092419; Murphy, 092718)	X				

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
231	GRANDE2202661	GRANDE2202663	12/11/13	Email chain re background detail on Grande marketing slide (w/ attach.) (appears as PX231 in: Murphy, 092718)		X			
232	GRANDE2191742	GRANDE2191743	12/9/13	Email chain re Retention Tools (appears as PX232 in: Murphy, 092718)		X			
233	GRANDE1913405	GRANDE1913405	10/28/11	Email chain re UT v Kansas - Piracy Protection (appears as PX233 in: Murphy, 092718)		X			
234	RIGHTSCORP 00004053	RIGHTSCORP 00004054	4/15/14	Email re Grande Termination Request for BMG Rights Management (US) LLC (w/ attach.) (appears as PX234 in: Murphy, 092718; Roeder, 111621)		X			
240				Webpage printout: "BitTorrent.org - For Users" (appears as PX240 in: Cohen, 110918)		X			
241				Webpage printout: BitTorrent.org BEP (appears as PX241 in: Cohen, 110918)		X			
247			3/21/18	Grande's Responses to Plaintiffs' Second Set of Interrogatories (appears as PX247 in: Feehan, 111518)		X			
248	GRANDE0046655	GRANDE0046655		Grande Retention Training (appears as PX248 in: Feehan, 111518)		X			
250	GRANDE0848107	GRANDE0848108	12/13/16	Email re 2017 rate Adjustment Residential Draft 121216 (w/ attach.) (appears as PX250 in: Feehan, 111518)		X			
252	PATRIOT00014834	PATRIOT00014837	12/10/13-12/11/13	Email Chain re Choice Commercial OCF (w/ attach.) (appears as PX252 in: Feehan, 111518)		X			
253	PATRIOT00084722	PATRIOT00084723	3/6/13	Email re Revised Grande Growth and Base Models (w/ attach.) (appears as PX253 in: Feehan, 111518)		X			
255	GRANDE0949410	GRANDE0949411	8/8/17	Email chain re Radiate Preliminary July Revenues (appears as PX255 in: Feehan, 111518; Roeder, 111619)		X			
256	GRANDE1851981	GRANDE1851982	8/28/17-8/29/17	Email chain re Wire Approval - Grande Copyright \$205k (appears as PX256 in: Feehan, 111518)		X			
257	PATRIOT00274131	PATRIOT00274131	6/25/15	Email re Google Alert - Cox Communications (appears as PX257 in: Roeder, 111618)		X			
258	PATRIOT00145508	PATRIOT00145508	3/30/15	Email re Google Alert - Cox Communications (appears as PX258 in: Roeder, 111618)		X			
259	GRANDE1802115	GRANDE1802119	8/23/16	Email Chain re DMCA (w/ attach.) (appears as PX259 in: Roeder, 111618)		X			
261	PATRIOT00039514	PATRIOT00039526	8/19/16-9/2/16	Email Chain re DMCA Email and Letter Calls Since 08/29/16 (appears as PX261 in: Roeder, 111618)		X			
262	PATRIOT00177841	PATRIOT00177841	8/16/16	Email Chain re Today's DMCA Call (appears as PX262 in: Roeder, 111618)		X			
265			10/23/18	Defendant Grande Communications Networks LLC's Fourth Amended Objections and Responses to Plaintiffs' First Set of Interrogatories (appears as PX265 in: Roeder, 111618)		X			
266	PATRIOT00102228	PATRIOT00102298	12/1/15	Memorandum Opinion in BMG v. Cox (appears as PX266 in: Roeder, 111618)	X				
272	GRANDE2551619			Report: Grande Residential Customer Acquisition Expense Analysis (2017-2018)	X				
273	GRANDE2551668		2/28/11	IRU Agreement between Grande and NextEra FiberNet, LLC		X			
274	GRANDE2551740			RCN CapEx summary	X				

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
 UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
275	GRANDE2551745			Grande and FPL Fibernet (Crown Castle) Capacity IRU details		X			
276	GRANDE2551746		2/28/11	Texas IRU and Purchase Option Agreement between Grande and NextEra FiberNet, LLC		X			
277				Webpage printout: "About Rightscorp" (printed from		X			
281				Webpage printout: "About Grande" (from Sept. 12, 2017) (printed from https://web.archive.org/web/20170912000903/http://mygrande.com/about)		X			
282				Webpage: "About Grande" (from Jan. 6, 2018) (printed from https://web.archive.org/web/20180106111851/http://mygrande.com:80/about)		X			
285			9/1/09	Multichannel News article: "Grande Agrees to Sale" (printed from https://www.multichannel.com/news/gra		X			
306			5/22/17	RCN.com Article: "RCN, Grande and Wave Broadband Join Forces" (printed from https://www.rcn.com/hub/about-		X			
307			5/20/14	PR Newswire Article: "Rightscorp Increases Representation to Surpass 1.5 Million Copyrights" (printed from		X			
331			10/26/18	Defendant Grande Communications Networks, LLC's Fifth Amended		X			
334	GRANDE0268512	GRANDE0268514	3/31/14	Email chain re BitTorrent Issue (appears as PX334 in: Murphy, 092718)		X			
335	GRANDE2551334	GRANDE2551549		Spreadsheet titled "Forwarded Emails to ISPs"		X			
340	GRANDE0000142	GRANDE0000143	11/29/10-12/1/10	Email chain re Question		X			
341	GRANDE0752121	GRANDE0752121	12/7/10	Email re DMCA		X			
342	GRANDE1038922	GRANDE1038923	12/9/10	Email re Updates b4 Vacation		X			
343	GRANDE1962193	GRANDE1962193	11/11/10	Email re DMCA		X			
344	GRANDE2007148	GRANDE2007148	4/21/11	Email Chain re DMCA		X			
345	GRANDE2008106	GRANDE2008106	4/21/11	Email re DMCA		X			
346	GRANDE0025516	GRANDE2551605		Summary of DMCA Notices received by year from 2010-2018 (appears as PX346 in: Horton, 092419)	X				
347	GRANDE0000023	GRANDE0000025	4/11/13	Email chain re DMCA notices	X				
348			8/3/12	Grande Communications High-Speed Internet Service Residential Subscriber Acceptable Use Policy (produced by Grande on 11/24/2017 in conjunction with Third Amended Resps. To Interrogs.)	X				
349				Grande Consolidated - Selected Financial Trends 2014-2017 (produced on 3/21/18 as attachment to Defendant's		X			
350				Printout: RIAA.com, U.S. Sales Database: Revenues by Format (printed from https://www.riaa.com/u-s-sales-database/)		X			
351	GRANDE00000164	GRANDE00000193		Compilation of Infringement Letters		X			
352	GRANDE00000004	GRANDE00000004	4/11/13	Email chain re DMCA Notices		X			
353	GRANDE00000014	GRANDE00000016	4/11/13	Email chain re DMCA Notices		X			
354	GRANDE00000017	GRANDE00000019	4/11/13	Email chain re DMCA Notices		X			
355	GRANDE00000020	GRANDE00000022	4/11/13	Email chain re DMCA Notices		X			
356	GRANDE00000026	GRANDE00000031	3/22/16	Email chain re Notice of Claimed Infringement - Case ID		X			
357	GRANDE00000032	GRANDE00000036	3/22/16	Email chain re Notice of Claimed Infringement - Case ID		X			
358	GRANDE00000037	GRANDE00000042	3/22/16	Email chain re Notice of Claimed Infringement - Case ID		X			
359	GRANDE00000043	GRANDE00000048	3/22/16	Email chain re Notice of Claimed Infringement - Case ID		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
360	GRANDE0000049	GRANDE0000054	3/22/16	Email chain re Notice of Claimed Infringement - Case ID		X			
361	GRANDE0000077	GRANDE0000079	3/31/16	Email chain re BitTorrent Issue		X			
362	GRANDE0000083	GRANDE0000086	3/31/16	Email chain re BitTorrent Issue		X			
363	GRANDE0000091	GRANDE0000094	3/31/16	Email chain re BitTorrent Issue		X			
364	GRANDE0000125	GRANDE0000135	4/1/14	Email chain re Notice of Claimed Infringement - Case ID		X			
365	GRANDE0000145	GRANDE0000154		Transit/Peering cost summary		X			
366	GRANDE0000158	GRANDE0000158	5/18/17	Spreadsheet: DMCA Excessive ViolationsV2 from 1/1/2017 - 1/31/2017		X			
367	GRANDE0000159	GRANDE0000159	6/1/17	Spreadsheet: DMCA Excessive ViolationsV2 from 1/1/2017 - 1/31/2017		X			
368	GRANDE0000160	GRANDE0000160		Spreadsheet: CSG account list		X			
369	GRANDE0000162	GRANDE0000162		Spreadsheet: CSG account list		X			
370	GRANDE0000163	GRANDE0000163		Spreadsheet: CSG account list		X			
371	GRANDE0000196	GRANDE0000196		Spreadsheet: Letters and Notices		X			
372	GRANDE0000197	GRANDE0000197		Spreadsheet: ticket tracker		X			
373	GRANDE0000198	GRANDE0000198		Spreadsheet: ticket tracker		X			
374	GRANDE0000201	GRANDE0000201		Spreadsheet: ticket tracker		X			
375	GRANDE0000202	GRANDE0000202		Spreadsheet: ticket tracker		X			
376	GRANDE0000203	GRANDE0000203		Spreadsheet: Specific Account DMCA Violations		X			
377	GRANDE0000204	GRANDE0000204		Spreadsheet: Specific Account DMCA Violations		X			
378	GRANDE0000206	GRANDE0000206		Spreadsheet: Specific Account DMCA Violations		X			
379	GRANDE0000207	GRANDE0000207		Spreadsheet: Specific Account DMCA Violations		X			
380	GRANDE0000208	GRANDE0000208		Spreadsheet: Specific Account DMCA Violations		X			
381	GRANDE0000209	GRANDE0000209		Spreadsheet: Specific Account DMCA Violations		X			
382	GRANDE0000210	GRANDE0000210		Spreadsheet: Specific Account DMCA Violations		X			
383	GRANDE0000211	GRANDE0000211		Spreadsheet: Specific Account DMCA Violations		X			
384	GRANDE0000213	GRANDE0000213		Spreadsheet: Specific Account DMCA Violations		X			
385	GRANDE0000215	GRANDE0000215		Spreadsheet: Specific Account DMCA Violations		X			
386	GRANDE0000216	GRANDE0000216		Spreadsheet: Specific Account DMCA Violations		X			
387	GRANDE0000219	GRANDE0000219		Spreadsheet: Specific Account DMCA Violations		X			
388	GRANDE0000223	GRANDE0000223		Spreadsheet: Specific Account DMCA Violations		X			
389	GRANDE0000225	GRANDE0000225		Spreadsheet: Specific Account DMCA Violations		X			
390	GRANDE0000226	GRANDE0000226		Spreadsheet: Specific Account DMCA Violations		X			
391	GRANDE0000227	GRANDE0000227		Spreadsheet: Specific Account DMCA Violations		X			
392	GRANDE0000228	GRANDE0000228		Spreadsheet: Specific Account DMCA Violations		X			
393	GRANDE0000229	GRANDE0000229		Spreadsheet: Specific Account DMCA Violations		X			
394	GRANDE0000230	GRANDE0000230		Spreadsheet: Specific Account DMCA Violations		X			
395	GRANDE0000236	GRANDE0000236		Spreadsheet: Ticket names and addresses		X			
396	GRANDE0000237	GRANDE0000237		Spreadsheet: Ticket names and addresses		X			
397	GRANDE0000238	GRANDE0000238		Spreadsheet: list of ticket numbers		X			
398	GRANDE0000240	GRANDE0000240		Spreadsheet: Specific Account DMCA Violations		X			
399	GRANDE0000241	GRANDE0000241		Spreadsheet: list of ticket numbers		X			
400	GRANDE0000242	GRANDE0000242		Spreadsheet: list of ticket numbers		X			
401	GRANDE0000244	GRANDE0000244		Spreadsheet: list of ticket numbers		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
402	GRANDE0002820	GRANDE0002820	4/8/13	Email re Email Activity Report - archive.atlanticbb.com [172.28.10.7]		X			
403	GRANDE0004039	GRANDE0004042	4/9/13	Email chain re Non Pay Processing Error.docx" (w/ attach.)		X			
404	GRANDE0008078	GRANDE0008078	4/14/13	Email re Email Activity Report - archive.atlanticbb.com [172.28.10.7]		X			
405	GRANDE0021830	GRANDE0021830	9/1/15	Email re CPNI and DMCA Letters Processed by CSG		X			
406	GRANDE0039789	GRANDE0039789	9/3/15	Email re CPNI and DMCA Letters Processed by CSG		X			
407	GRANDE0046702	GRANDE0046702	9/7/15	Email re CPNI and DMCA Data Sent to CSG		X			
408	GRANDE0048062	GRANDE0048062	9/8/15	Email re CPNI and DMCA Data Sent to CSG		X			
409	GRANDE0049424	GRANDE0049424	9/9/15	Email re CPNI and DMCA Letters Processed by CSG		X			
410	GRANDE0049878	GRANDE0049880	9/9/15	Email re FW: August 2015 Revenue Flash (w/ attach.)		X			
411	GRANDE0097879	GRANDE0097880	12/1/15	Email re marketing Oct P&L over/under explanations (w/ attach.)		X			
412	GRANDE0104911	GRANDE0104933	9/21/15	Email re 2015 Walkthrough Narrative Discussions (w/ attach.)		X			
413	GRANDE0131576	GRANDE0131578	4/19/16	Email chain re FW: Preliminary March Results (w/ attach.)		X			
414	GRANDE0131933	GRANDE0131935	4/19/16	Email re Preliminary March Results (w/ attach.)		X			
415	GRANDE0134774	GRANDE0134774	2/3/14	Email re CPNI and DCMA Data Sent to CSG		X			
416	GRANDE0135204	GRANDE0135204	2/4/14	Email re CPNI and DCMA Letters Processed by CSG		X			
417	GRANDE0179874	GRANDE0179875	10/14/15	Email chain re FW: Termination of Employment Policy		X			
418	GRANDE0182618	GRANDE0182619	5/5/14	Email chain re Re: Grande Weekly Report		X			
419	GRANDE0183290	GRANDE0183292	5/5/14	Email chain re Re: Grande Weekly Report (w/ attach.)		X			
420	GRANDE0194408	GRANDE0194409	5/8/14	Email chain re Re: one month promo update		X			
421	GRANDE0222322	GRANDE0222323	3/12/14	Email re 2013 Bonus Message		X			
422	GRANDE0249487	GRANDE0249489	5/28/14	Email chain re: Re: you both around in San marcos this week? (w/ attach.)		X			
423	GRANDE0301949	GRANDE0301950	4/10/14	Email chain re: Re: Grande		X			
424	GRANDE0420135	GRANDE0420137	8/12/10	Email chain re Re: DMCA		X			
425	GRANDE0443293	GRANDE0443297	6/11/14	Email chain re: RE: Grande Weekly Report		X			
426	GRANDE0443439	GRANDE0443442	6/11/14	Email chain re: Re: Grande Weekly Report		X			
427	GRANDE0445790	GRANDE0445791	7/17/17	Email re Weekly Customer Changes was executed at 7/17/2017 8:28:03 AM (w/ attach.)		X			
428	GRANDE0493783	GRANDE04937834	7/31/17	Email re Weekly Customer Changes was executed at 7/17/2017 8:28:03 AM (w/ attach.)		X			
429	GRANDE0496635	GRANDE0496636	7/31/17	Email re Grande Consolidated Cable PL YTD (Jun 17).xlsx (w/ attach.)		X			
430	GRANDE0503881	GRANDE0503881	8/2/17	Email re Adding to the general script...		X			
431	GRANDE0542113	GRANDE0542114	8/28/14-8/29/14	Email chain re and this just happened		X			
432	GRANDE0850933	GRANDE0850934	4/21/17	Email chain re Billboard journalist seeks comment on lawsuit		X			
433	GRANDE0850987	GRANDE0850987	4/22/17	Email chain re RIAA		X			
434	GRANDE0851512	GRANDE0851514	4/22/17	Email chain re Fwd: Billboard journalist seeks comment on lawsuit		X			
435	GRANDE0856216	GRANDE0856216	4/25/17	Email re Ryan Thompson		X			
436	GRANDE0992589	GRANDE0992590	10/24/12	Email chain re Re: Suddenlink Contact		X			
437	GRANDE1007300	GRANDE1007300	11/5/12	Email chain re DCMA?		X			
438	GRANDE1021103	GRANDE1021103	11/19/12	Email re Email Activity Report		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
439	GRANDE1093477	GRANDE1093477	7/11/17	Email re DMCA Violation Notification		X			
440	GRANDE1435500	GRANDE1435500	2/18/16	Email chain re Rightscorp - DMCA		X			
441	GRANDE1435505	GRANDE1435505	2/18/16	Email chain re Rightscorp - DMCA		X			
442	GRANDE1438176	GRANDE1438177	2/22/16	Email chain re RightsCorp -- Customers Network Infringement Ltr		X			
443	GRANDE1438198	GRANDE1438199	2/22/16	Email re Rightscorp (w/ attach.)		X			
444	GRANDE1438393	GRANDE1438395	2/22/16	Email chain re RE: RightsCorp -- Customers Network Infringement Ltr		X			
445	GRANDE1646092	GRANDE1646092	2/23/16	Email chain re CPNI and DMCA Data Sent to CSG		X			
446	GRANDE1715186	GRANDE1715189	5/17/16	Email chain re Grande - DMCA Police for Website (w/ attachs.)		X			
447	GRANDE1718830	GRANDE1718830	5/19/16	Email re DMCA - ABUSE notifications		X			
448	GRANDE1843984	GRANDE1843986	8/22/17	Email chain re RE: legal fees		X			
449	GRANDE1933659	GRANDE1933659	8/11/10	Email re DMCA		X			
450	GRANDE2200018	GRANDE2200019	8/15/16	Email re Important Message from Jim Holanda		X			
451			4/30/17	San Marcos Daily Article: "Grande Communications announces expansion of 1 gigabit internet service"		X			
452			9/12/14	Multichannel.com Article: "Grande Names Matt Rohre Interim President" (printed from http://www.multichannel.com/news/technology/grande-names-matt-rohre-interim-president/383786)		X			
453			4/25/17	Kxan.com Article: "Grande expands gigabit service to more Austin customers" (printed from http://kxan.com/2017/04/25/grande-expands-gigabit-service-to-more-austin-customers/)		X			
454			Oct-17	Tab from Oct. Analysis Spreadsheet (Detail) (produced by Grande on 11/24/2017 in conjunction with Third Amended Resps. To Interrogs.)		X			
455			Oct-17	Tab from Oct. Analysis Spreadsheet (Status) (produced by Grande on 11/24/2017 in conjunction with Third Amended Resps. To Interrogs.)		X			
456			Oct-17	Tab from Oct. Analysis Spreadsheet (Summary) (produced by Grande on 11/24/2017 in conjunction with Third Amended Resps. To Interrogs.)		X			
457			7/31/18	Expert Report of Robert A. Bardwell	X				
458				Curriculum Vitae of Robert A. Bardwell (transmitted 7/13/18, Expert Report of Robert A. Bardwell)	X				
459				Asserted Copyrights and Documented Infringements (transmitted 7/13/18, Ex. RAB-1, Expert Report of Robert A. Bardwell)	X				
460				Grande IP Address Pool (transmitted 7/13/18, Ex. RAB-2, Expert Report of Robert A. Bardwell)	X				
461				Summary of Each IP Address Infringing on Asserted Copyrights (transmitted 7/13/18, Ex. RAB-3, Expert Report of Robert A. Bardwell)	X				
462				Consecutive Days with Infringement by IP addresses (transmitted 7/13/18, Ex. RAB-4, Expert Report of Robert A. Bardwell)	X				
463				All Infringement Events Related to Chart 1 (transmitted 7/13/18, Ex. RAB-5, Expert Report of Robert A. Bardwell)	X				
464				All Ports Associated with Infringements (transmitted 7/13/18, Ex. RAB-6, Expert Report of Robert A. Bardwell)	X				

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
465				All Song Profiles Made Available by Subscribers (transmitted 7/13/18, Ex. RAB-7, Expert Report of Robert A. Bardwell)	X				
466				All Infringements Related to Chart 3 (transmitted 7/13/18, Ex. RAB-8, Expert Report of Robert A. Bardwell)	X				
467				Markov Model Formulas (transmitted 7/13/18, Ex. RAB-9, Expert Report of Robert A. Bardwell)	X				
468				All Infringements Related to Chart 5 (transmitted 7/13/18, Ex. RAB-10, Expert Report of Robert A. Bardwell)	X				
469				Markov Model Results by Single Port Suspected Account (transmitted 7/13/18, Ex. RAB-11, Expert Report of Robert A. Bardwell)	X				
470				Markov Model Results by Random Port Suspected Account (transmitted 7/13/18, Ex. RAB-12, Expert Report of Robert A. Bardwell)	X				
471				Markov Model Results by Non-Random Port Suspected Account (transmitted 7/13/18, Ex. RAB-13, Expert Report of Robert A. Bardwell)	X				
472				Markov Model Results by Modified Single Port Suspected Account (transmitted 7/13/18, Ex. RAB-14, Expert Report of Robert A. Bardwell)	X				
473				Markov Model Results by Modified Non-Random Port Suspected Account (transmitted 7/13/18, Ex. RAB-15, Expert Report of Robert A. Bardwell)	X				
474				All Infringements Recorded for Longest Infringing Verified Account (transmitted 7/13/18, Ex. RAB-16, Expert Report of Robert A. Bardwell)	X				
475				All Infringements Recorded for Most	X				
476				All Infringements Related to Verified	X				
477				Documentation of BitTorrent Users Modifying Ports (transmitted 7/13/18, Ex. RAB-19, Expert Report of Robert A. Bardwell)	X				
478				Probability Parameters in the Markov Model (transmitted 7/13/18, Ex. RAB-20, Expert Report of Robert A. Bardwell)	X				
479				Rate Parameters in the Markov Model (transmitted 7/13/18, Ex. RAB-21, Expert Report of Robert A. Bardwell)	X				
480				Sensitivity Analysis of Parameters in Markov Model (transmitted 7/13/18, Ex. RAB-22, Expert Report of Robert A. Bardwell)	X				
481				Grande File Share Parameters (transmitted 7/13/18, Ex. RAB-23, Expert Report of Robert A. Bardwell)	X				
482	RC-D_00000001	RC-D_00000010		RC-D_00000001.htm through RC-D_00000010.htm. (cited in Expert Report of Robert A. Bardwell, 7/13/18 (produced in RC-D001))		X			
483				RC-D001.xlsx (cited in Expert Report of Robert A. Bardwell, 7/13/18 (produced with RC-D001))		X			
484			11/26/11-11/28/11	Academic Article: "User Tracking on the Web via Cross-Browser Fingerprinting" (cited in Expert Report of Robert A. Bardwell, 7/13/18)		X			
485				Academic Article: "Detecting Stealthy P2P Botnets Using Statistical Traffic Fingerprints" (cited in Expert Report of Robert A. Bardwell, 7/13/18)		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
 UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
486			3/28/08	Article: "10 Tips and Tricks for Private Bittorrent Sites" (cited in Expert Report of Robert A. Bardwell, 7/13/18)		X			
487			Nov. 2002	Article: "Observed Structure of Addresses in IP Traffic" (cited in Expert Report of Robert A. Bardwell, 7/13/18)		X			
488			Aug. 2007	Academic Article: "How Dynamic are IP Addresses?" (cited in Expert Report of Robert A. Bardwell, 7/13/18)		X			
489			Jan. 2011	Academic Article: "Technical report: An		X			
490			2009	Academic Article: "On Dominant Characteristics of Residential Broadband Internet Traffic" (cited in Expert Report of Robert A. Bardwell,		X			
491			4/24/11	Article: "uTorrent – Randomize port at each start" (cited in Expert Report of Robert A. Bardwell, 7/13/18)		X			
492			6/2/15	Forum: "How to have client automatically change port when blocked?" (cited in Expert Report of Robert A. Bardwell, 7/13/18)		X			
493			4/24/11	Forum: "Port Mapping – General Discussion" (cited in Expert Report of Robert A. Bardwell, 7/13/18)		X			
494			8/17/18	Reply of Robert A. Bardwell to the Report of Jonathan E. Kemmerer	X				
495				Abuse Information from Additional Grande Abuse Notices (transmitted 8/17/18, Ex. RAB-24, Reply of Robert A. Bardwell to the Report of Jonathan E. Kemmerer)		X			
496				Exhibit A.xlsx (produced from Kemmerer workfiles) (cited in Reply of Robert A. Bardwell to the Report of Jonathan E. Kemmerer, 8/17/18)		X			
497				Notices - Actual.xlsx (produced from Kemmerer workfiles) (cited in Reply of Robert A. Bardwell to the Report of Jonathan E. Kemmerer, 8/17/18)		X			
498	RC-D_00000001	RC-D_00000010		RC-D_00000001.htm through RC-D_00000010.htm. (cited in Reply of Robert A. Bardwell to the Report of Jonathan E. Kemmerer, 8/17/18 (produced in RC-D001))		X			
499				RC-D001.xlsx (cited in Reply of Robert A. Bardwell to the Report of Jonathan E. Kemmerer, 8/17/18 (produced with RC-D001))		X			
500				Expert Report of Barbara Frederiksen-Cross	X				
501				Frederiksen-Cross Materials Received or Reviewed (transmitted 7/27/18, Expert Report of Barbara Frederiksen-Cross, Ex. B)	X				
502				Rightscorp Source Code Files (transmitted 7/27/18, Expert Report of Barbara Frederiksen-Cross, Ex. C)	X				
503				Rightscorp Source Code Description (transmitted 7/27/18, Expert Report of Barbara Frederiksen-Cross, Ex. D)	X				
504				Rightscorp email re Unauthorized Use of Copyrights (w/ attach.) (transmitted 7/27/18, Expert Report of Barbara Frederiksen-Cross, Ex. E)	X				
505				Sample of 2012 Rightscorp Infringement Notice (transmitted	X				
506				Sample of Rightscorp Termination Request (transmitted 7/27/18, Expert Report of Barbara Frederiksen-Cross, Ex. G)	X				

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
507				Torrents Used in Jurislogic 2018 Testing (transmitted 7/27/18, Expert Report of Barbara Frederiksen-Cross,	X				
508				Songs Used in Jurislogic 2018 Testing (transmitted 7/27/18, Expert Report of Barbara Frederiksen-Cross, Ex. I)	X				
509				Sample Notice from Grande to Subscribers (transmitted 7/27/18, Expert Report of Barbara Frederiksen-Cross, Ex. J)	X				
510	RIGHTSCORP 00004000	RIGHTSCORP 00004000	c.2014	Repeat Infringers Spreadsheet (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
511	RIGHTSCORP 00004001	RIGHTSCORP 00004002	11/17/16	Email re Grande Communications Termination request for BMG Rights Management (US) LLC (w/ attach.) (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
512	RIGHTSCORP 00004002	RIGHTSCORP 00004002	c.2014	Repeat Infringers Spreadsheet (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
513	RIGHTSCORP 00004229	RIGHTSCORP 00004230	11/9/15	Email re Grande Communications Termination request for Imagem USA (w/ attach.) (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
514	RIGHTSCORP 00004230	RIGHTSCORP 00004230	c.2015	Repeat Infringers Spreadsheet (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
515	GRANDE0000156	GRANDE0000156	c.2017	DMCA Excessive Violations Spreadsheet (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
516	GRANDE0000157	GRANDE0000157		Infringement Spreadsheet (cited in		X			
517	GRANDE0000164	GRANDE0000182		Compilation of Infringement Letters (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
518	GRANDE0000184	GRANDE0000188		Compilation of Infringement Letters (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
519	RIGHTSCORP 00003999	RIGHTSCORP0000 4000	11/23/14	Email re Grande Communications Termination request for BMG Rights Management (US) LLC (w/ attach.) (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
520	RIGHTSCORP 00004002	RIGHTSCORP 00004002	11/17/14	Email re Grande Communications Termination request for BMG Rights Management (US) LLC (w/ attach.) (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
521	RC-D_00000001	RC-D_01350635		Hard drive containing Sony-v-Grande RC-D001.zip (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
522	RC-D_00140075	RC-D_00140075		Sample test infringement notice (Ex. E, Expert Report of Barbara Frederiksen-Cross, 7/27/18)		X			
523	RC-D_00140075	RC-D_00140075		RC-D_00140075 (excerpt) (Ex. E, Expert Report of Barbara Frederiksen-Cross, 7/27/18 (in production RC-		X			
524	RC-D_00140075	RC-D_00140075		RC-D_00140075.htm (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18 (in production RC-D001))		X			
525	RC-D_00000009	RC-D_00000009		RC-D_00000009.htm (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18 (in production RC-D001))		X			
526	RC-D_00010009	RC-D_00010009		RC-D_00010009.htm (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18 (in production RC-D001))		X			
527	RCD_00020020	RCD_00020020		RCD_00020020.htm (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18 (in production RC-D001))		X			
528	RC-D_00030022	RC-D_00030022		RC-D_00030022.htm (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18 (in production RC-D001))		X			

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
529	RC-D_00600310	RC-D_00600310		RC-D_00600310.htm (cited in Expert		X			
530	RC-D_01020505	RC-D_01020505		RC-D_01020505.htm (cited in Expert Report of Barbara Frederiksen-Cross, 7/27/18 (in production RC-D001))		X			
531				Printout: "ISP Insight: Rightscorp" (from https://secure.digitalrightscorp.com/isp/List.html) (cited in Expert Report of		X			
532			7/27/18	Expert Reply Report of Barbara Frederiksen-Cross	X				
533				Frederiksen-Cross Curriculum Vitae, Qualification, Testimony (transmitted 8/31/18, Expert Rebuttal Report of Barbara Frederiksen-Cross, Ex. A)	X				
534				List of Materials Received or Reviewed (transmitted 8/31/18, Expert Rebuttal Report of Barbara Frederiksen-Cross, Ex. B)	X				
535				Rightscorp Source Code Description (transmitted 8/31/18, Expert Rebuttal Report of Barbara Frederiksen-Cross, Ex. D)	X				
536	GRANDE0000205	GRANDE0000205		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
537	GRANDE0000212	GRANDE0000212		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
538	GRANDE0000214	GRANDE0000214		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
539	GRANDE0000217	GRANDE0000217		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
540	GRANDE0000218	GRANDE0000218		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
541	GRANDE0000220	GRANDE0000220		Spreadsheet listing Specific Account		X			
542	GRANDE0000221	GRANDE0000221		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
543	GRANDE0000222	GRANDE0000222		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
544	GRANDE0000224	GRANDE0000224		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
545	GRANDE0000239	GRANDE0000239		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
546	GRANDE0000245	GRANDE0000245		Spreadsheet listing Specific Account DMCA Violations (cited in Expert Rebuttal Report of Barbara Frederiksen-Cross, 8/31/18)		X			
547				Second Rebuttal Expert Report of Barbara Frederiksen-Cross (transmitted 2/3/20, Second Rebuttal Expert Report of Frederiksen-Cross)	X				
548			7/13/18	Expert Report of William H. Lehr	X				
549				Curriculum Vitae of William H. Lehr	X				
550				U.S. Sound Recording Industry	X				

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
551				Summary of Findings on the Impact of Illegal File Sharing on the Music Industry (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 2)	X				
552				Summary of Findings on the Impact of Streaming On Piracy in the Music Industry (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 3)	X				
553				Grande Residential Revenues and Subscriber Counts (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 4)	X				
554				Grande Consolidated Revenue and Profit (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 5)	X				
555				Average Monthly ARPU - High-Speed Internet Service (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 6)	X				
556				Average Monthly ARPU - Video Service (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 7)	X				
557				Average Monthly ARPU - Voice Service (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 8)	X				
558			c.2016	2016 Monthly Blended Bundle ARPU for Grande High-Speed Internet Residential Subscribers (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 9)	X				
559			c.2016	2016 Monthly Blended Bundle Gross Margin for Grande High-Speed Internet Residential Subscribers (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 10)	X				
560				Subscriber Lifetime Value: Gross Margin Methodology for Grande High-Speed Internet Residential Subscribers (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 11)	X				
561				Subscriber Value Implied by Cable Industry Transactions (transmitted 7/13/18, Expert Report of William H. Lehr, Ex. 12)	X				
562				Estimated Value to Grande of Retaining	X				
563	RIAA_00059812	RIAA_00059812		"U.S. Recorded Music Revenues by Format," Recording Industry Association of America (transmitted 7/13/18, cited in Expert Report of		X			
564	GRANDE0078377	GRANDE0078377		Grande Products and Services		X			
565	GRANDE0098809	GRANDE0098809	9/18/15	Email re Training deck Retention (w/ attach.) (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
566	GRANDE0135876	GRANDE0135877	2/3/14-2/4/14	Email re copycat (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
567	GRANDE0509709	GRANDE0509709	1/31/11-2/1/11	Email chain re Employee Memo/Summary (w/ attachs.) (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
568	GRANDE0618690	GRANDE0618690	9/1/16-9/2/16	Email chain re Grande C-SAT Report (w/ attach.) (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
569	GRANDE0662924	GRANDE0662924	9/9/14	Email chain re Grande in the News (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
570	GRANDE0863082	GRANDE0863082		Grande Finances Spreadsheet (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
571	GRANDE0949411	GRANDE0949411		Grande Finances Spreadsheet (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
572	GRANDE0980961	GRANDE0980965	10/3/12 - 10/11/12	Email chain re product combination church analysis (w/ attach.) (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
573	GRANDE1064140	GRANDE1064140		Grande Competitive Update Powerpoint, Feb. 2017 (transmitted 7/13/18, cited in Expert Report of		X			
574	GRANDE1374400	GRANDE1374400		Grande Finances Spreadsheet (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
575	GRANDE1715401	GRANDE1715401		Grande Finances Spreadsheet (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
576	GRANDE1840451	GRANDE1840451		Grande Austin Market Doc. (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
577	GRANDE1871837	GRANDE1871837		Grande 2011 Financial Tracking Spreadsheet (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
578	GRANDE2551606	GRANDE2551606		Grande Finances Spreadsheet (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
579	PATRIOT00044572	PATRIOT00044572		Grande 2013 Budget Spreadsheet (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
580	PATRIOT00152074	PATRIOT00152074		RCN Cable Finances Spread (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
581			12/13/15	Article: "Digital Broadband Content: Music" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
582			3/31/16	2016 Valuation Handbook: Industry Cost of Capital (transmitted 7/13/18, cited in Expert Report of William H.		X			
583			4/23/14	Academic Article: "Piracy and Music Sales: The Effects of An Anti-Piracy Law" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
584			c.2016	Academic Article: "Digital Music Consumption on the Internet: Evidence from Clickstream Data" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
585			c.2017	Academic Article: "Let The Music Play? Free Streaming and its Effects on Digital Music Consumption" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
586			c.2017	Academic Article: "As Streaming Reaches Flood Stage: Does Spotify Stimulate or Depress Music Sales?" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
587			c.June 2017	Academic Article: "Streaming or Stealing? The complementary features between music streaming and music piracy" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
588			8/25/15	Academic Article: "Copyright Enforcement in the Digital Age: Empirical Economic Evidence and Conclusions" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
589			c.Feb. 2017	Academic Article: "Copyright Enforcement in the Digital Age: Empirical Evidence and Policy Implications" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
590			c.Sept. 2014	Academic Article: "The Effect of Graduated Response Anti-Piracy Laws on Music Sales: Evidence from An Event Study in France" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
591			c. 2015	Academic Article: "Music Piracy: Bad for Record Sales but Good For The iPod?" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
592			c.April 2006	Academic Article: "File Sharing: Creative Destruction or Just Plain Destruction?" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
593			4/6/18	Academic Article: "The Impact of Internet Piracy on Sales and Revenues of Copyright Owners" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
594			c.2014	Academic Article: "The Impacts of Internet Piracy" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
595			c.2011	Academic Article: "Quantifying Global Transfers of Copyrighted Content Using BitTorrent" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
596			c.2006	Academic Article: "The Impact of Digital File Sharing on the Music Industry: An Empirical Analysis" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
597			c.2016	Academic Article: "The Effect of File Sharing on Record Sales, Revisited" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
598			c.April 2006	Academic Article: "Piracy on the High C's: Music Downloading, Sales Displacement, and Social Welfare in a Sample of College Students" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
599			c.2010	Academic Article: "Music File Sharing and Sales Displacement in the iTunes Era" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
600			c. April 2006	Academic Article: "Measuring the Effect of File Sharing on Music Purchases" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
601			c.2011	Textbook: "Accounting for Decision Making and Control" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
602			6/18/12	Article: "BC Partners, CPP Investment Board, and Management Agree to Acquire Suddenlink for \$6.6 Billion" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
603			c. Oct. 2014	Article: "Broadband Cable Financial Databook, 2015 Edition" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
604			c. Dec. 2010	Article: "Broadband decisions: What drives consumers to switch – or stick with – their broadband Internet provider" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
605				Spreadsheet: Cable System Sales Summary, December (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
606			6/14/10	Article: "Cablevision Announces Acquisition of Bresnan		X			
607			7/1/13	Article: "Charter Completes Its Acquisition of Optimum West from Cablevision" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
608			3/31/15	Article: "Charter to Acquire Bright House Networks for \$10.4 Billion" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
609			6/6/17	Article: "Cisco Visual Networking Index: Forecast and Methodology, 2016-2021" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
610			c. Aug. 2004	Article: "Copyright Issues in Digital Media" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
611			c. July 2013	Article: "Copyright Policy, Creativity, and Innovation in the Digital Economy" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
612			5/4/16	Article: "FCC approves Altice purchase of Cablevision Systems" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
613			1/8/17	Article: "GTCR Announces Sale Of Rural Broadband Investments To Cable One" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
614			4/12/10	Article: "Intellectual Property: Observations on Efforts to Quantify the Economic Effects of Counterfeit and Pirated Goods" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
615			8/4/11	Article: "Mediacom Communications to Build New Corporate Headquarters in Orange County, New York" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
616			c.2016	Article: "Music Consumer Insight Report 2016" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
617			c. Sept. 2017	Article: "Music Consumer Insight Report" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
618			c. Nov. 2017	Article: "Public MSOs' revenues and EBITDA summary, Q3 2016 - Q3 2017" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
619			c. March 2017	Article: "Public MSOs' revenues and operating cash flows summary, 2014-2016" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
620			8/10/10	Article: "RCN Reports Second Quarter 2010 Results" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
621			1/24/18	Article: "RCN/Grande Closes Acquisition of Wave Broadband" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
622			c. Aug. 2012	Article: "The Impact of Intellectual Property Theft on the Economy" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
623			2/26/12	Article: "The NPD Group: Music File Sharing Declined Significantly in 2012" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
624				Article: "Time Warner Cable Inc. acquires Insight Communications Company Inc." (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
625			4/12/18	Article: "Transactions Overview" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
626			4/18/12	Article: "WideOpenWest to buy Knology for \$1.5B" (transmitted 7/13/18, cited in Expert Report of		X			
627			4/17/17	Article: "The rise of music streaming services hasn't killed music piracy" (transmitted 7/13/18, cited in Expert		X			
628			4/5/18	Article: "The Best VPNs for BitTorrent" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
629			4/1/16	Article: "Illegal streaming is dominating online piracy" (transmitted 7/13/18,		X			
630			12/21/15	Article: "Altice Closes Suddenlink Deal" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
631			5/18/16	Article: "Charter completes purchase of Time Warner Cable, Bright House" (transmitted 7/13/18, cited in Expert		X			
632			9/3/14	Article: "Factors impacting cable churn in 2014 and beyond" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
633			3/17/15	Article: "HSD eclipses video in revenue gains in 2014, but video ARPU still undisputed leader" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
634			8/11/17	Article: "What Exactly Is Stream-Ripping, The New Way People Are Stealing Music" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
635			c.2012	Article: "Customer Centricity in the Telecommunications Industry" (transmitted 7/13/18, cited in Expert		X			
636			c. Sept. 2013	Article: "Sizing the Piracy Universe" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
637			11/13/12	Article: "Cord-Cutting: Cable's Offer You Can't Refuse" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
638			c. Aug. 2007	Article: "The True Cost of Sound Recording Piracy to the U.S. Economy" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
639			2/16/16	Article: "Piracy and the Supply of New Creative Works" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
640			2/2/16	Article: "The Truth About Piracy" (transmitted 7/13/18, cited in Expert Report of William H. Lehr)		X			
641			8/17/18	Expert Reply Report of William H. Lehr	X				
642			c.2015	Textbook: "Corporate Finance" (transmitted 8/17/18, cited in Expert Reply Report of William H. Lehr)		X			
643			1/15/18	Article: "2017 Streaming Price Bible! Spotify per Stream Rates Drop 9%, Apple Music Gains Marketshare of Both Plays and Overall Revenue," (transmitted 8/17/18, cited in Expert Reply Report of William H. Lehr)		X			
644			c.2017	Article: "2017 Vivendi Annual Report" (transmitted 8/17/18, cited in Expert Reply Report of William H. Lehr)		X			
645			c. Jan. 2011	Article: "Technical report: An Estimate of Infringing Use of the Internet" (transmitted 8/17/18, cited in Expert Reply Report of William H. Lehr)		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
646			c.2018	Article: "What We Do" (transmitted 8/17/18, cited in Expert Reply Report of William H. Lehr)		X			
647			1/21/16	Article: "Netflix isn't just hurting pay TV, it's also slowly killing online piracy" (transmitted 8/17/18, cited in Expert Reply Report of William H. Lehr)		X			
648	GRANDE0617219	GRANDE0617219	Sept., 2016	Grande Competitive Update (transmitted 8/17/18, cited in Expert Reply Report of William H. Lehr)		X			
649	GRANDE1064811	GRANDE1064811	June, 2017	Grande Competitive Update (transmitted 8/17/18, cited in Expert Reply Report of William H. Lehr)		X			
650			1/15/18	Spreadsheet: "Per Stream Royalty Rates" (transmitted 8/17/18, cited in Expert Reply Report of William H. Lehr)		X			
651			7/13/18	Expert Report of Terrence P. McGarty	X				
652				Curriculum Vitae of Terrence P. McGarty	X				
653				Spreadsheet: DMCA Notices Entered into Abuse Database, Instances of Infringement Identified, and Letters Sent to Grande Subscribers (transmitted 7/13/18, Expert Report of Terrence P. McGarty, Ex. 1)	X				
654				Grande FCC Network Management Disclosure (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
655	GRANDE0000011	GRANDE0000013	4/11/13	Email chain re DMCA notices (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
656	GRANDE0000074	GRANDE0000074	3/31/13	Email chain including M. Murphy and R. Creel (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
657	GRANDE0000075	GRANDE0000076	3/31/13	Email chain including M. Murphy, R. Creel, and W. Hardeman (w/ attach.) (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
658	GRANDE0000080	GRANDE0000082	3/31/13	Email chain including M. Murphy, R. Creel, and W. Hardeman (w/ attach.) (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
659	GRANDE0000087	GRANDE0000090	3/31/13	Email chain including M. Murphy, R. Creel, and W. Hardeman (w/ attach.) (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
660	GRANDE0000161	GRANDE0000161		Infringement Letter (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
661	GRANDE0000188	GRANDE0000189	6/20/17	Email from Grande to M. Sooby (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
662	GRANDE0540116	GRANDE0540116	5/5/11	Email re DMCA (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
663	GRANDE1438279	GRANDE1438280	2/18/16	Email chain re Rightscorp - DMCA (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
664	GRANDE1438371	GRANDE1438372		Grande Drafted Letter (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
665	GRANDE1438373	GRANDE1438374		Grande Drafted Letter (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
666	GRANDE2049666	GRANDE2049666		Grande Management Team Powerpoint (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
667	PATRIOT00047600	PATRIOT00047601	8/16/16	Email chain re Today's DMCA call (cited in Expert Report of Terrence P. McGarty, 7/13/18)		X			
668			c.2004	Book: "Modern Cable Television Technology: Video, Voice, and Data Communications" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
669			c.2014	Book: "Network Security Through Data Analysis" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
670			c.2013	Academic Article: "Standards for Determining When ISPs Have Fallen Out of Section 512(A)" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
671			c.2013	Academic Article: "The Politics of Deep Packet Inspection: What Drives Surveillance by Internet Service Providers?" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
672			c.2015	Academic Article: "Cable Networks, Services, and Management" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
673			c. April 2006	Academic Article: "Measuring the Effect of File Sharing on Music Purchases" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
674			c. June 2003	Academic Article: "Detection and Classification of Peer-to-Peer Traffic: A Survey" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
675				Academic Article: "The Internet's Coming of Age" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
676			4/16/18	Article: "1 Gig Internet Speed Comparison" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
677			c.2018	Article: "About Grande" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
678			9/3/09	Article: "ABRY Partners Buying Grande Communications" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
679			c. June 2012	Article: "An Overview of the IETF Network Management Standards" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
680			2/12/14	Article: "Cableco Gigabit Broadband Plans are Not HFC-Based" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
681			12/17/15	Article: "Cox Communications Found Liable for Users' Downloading" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
682			c.2018	Article: "Grande: FCC Network Management Disclosure" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
683				Article: "History of Cable" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
684				Article: "How fast is Fiber Optic Internet?" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
685				"Management Services Agreement," Atlantic Broadband Finance, LLC (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
686				Grande Article: "Popular Deals" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
687			5/22/17	Article: "RCN, Grande and Wave Broadband Join Forces" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
688				Article: "The Basics of BitTorrent" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			

PLAINTIFFS' 12/28/2021 EXHIBIT LIST
UMG RECORDINGS, INC., et al., v. GRANDE COMMUNICATIONS NETWORKS LLC
 Civil Action No. 1:17-cv-00365-DAE-AWA

PX	Beg Bates	End Bates	Date		Expects to Offer	May Offer	Admitted	Date Admitted	Obj(s)
689			2/1/17	Article: "TPG Capital Completes RCN and Grande Acquisitions" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
690			8/15/16	Article: "TPG Capital to Acquire RCN and Grande Communications" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
691				Grande Article: "Use Your Own Modem" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
692			2/1/15	Article: "Grande beats AT&T, Google Fiber with 1 Gbps launch in San Antonio" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
693			11/20/14	Article: "Grande extends 1Gbps service into more parts of Austin" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
694				CSG International Web Homepage (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
695			3/5/10	Article: "RCN to Sell Itself for \$1.2 Billion" (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
696				OSG Billing Services Webpage (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
697	GRANDE0019396	GRANDE0019396		Spreadsheet: Grande High Level Transition Services Planning (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
698	GRANDE0813932	GRANDE0813932		Financial Spreadsheet (transmitted 7/13/18, Expert Report of Terrence P. McGarty)		X			
699				Declaration of Wade Leak in Support of Plaintiffs' Opposition to Defendant Grande Communications Networks LLC's Motion for Summary Judgment and Plaintiffs' Cross-Motion for Summary Judgment		X			
700				List of Sony plaintiffs' works in suit		X			
701			9/14/18	Declaration of Steven Poltorak in Support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment		X			
702				List of Warner Bros. plaintiffs' works in suit		X			
703				Frederiksen-Cross Curriculum Vitae, Qualification, Testimony (transmitted 2/3/20, Second Rebuttal Expert Report of Frederiksen-Cross, Ex. A)	X				
704				Materials Received and Reviewed (transmitted 2/3/20, Second Rebuttal		X			
705				The BitTorrent Protocol Specification from BitTorrent.org (transmitted 2/3/20, Second Rebuttal Expert Report of Frederiksen-Cross, Ex. C)		X			
706				Sample of BitTorrent Traffic (transmitted 2/3/20, Second Rebuttal Expert Report of Frederiksen-Cross, Ex.		X			
707				BitTorrent Control Packets - Test with Default uTorrent Configuration		X			
708				BitTorrent Control Packets - Test with "Parasite" uTorrent Configuration		X			